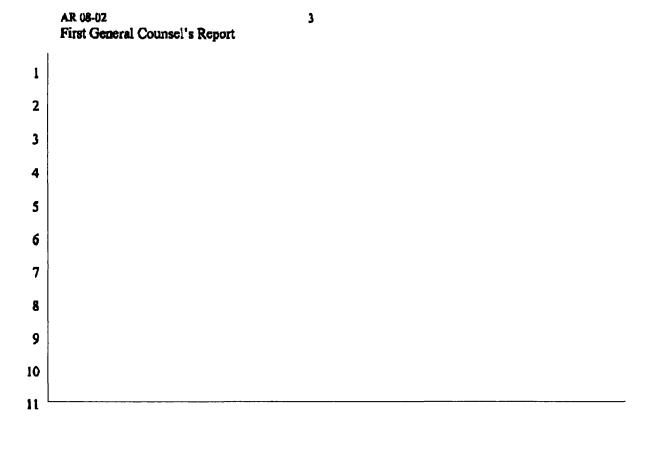
1 2 3	FEDERAL ELECTION COMMISSION 999 E Street, N.W. Washington, D.C. 20463 FIRST GENERAL COUNSEL'S REPORT	
4		
5 6 7 8 9 10 11		AUDIT REFERRAL: 08-02 DATE REFERRED: February 8, 2008 DATE ACTIVATED: February 26, 2008 STATUTE OF LIMITATIONS: 02/21/10 - 01/31/12
13 14	SOURCE:	INTERNALLY GENERATED
15 16 17	RESPONDENTS:	Dallas County Republican Party and Jonathan Neerman, in his official capacity as treasurer
18 19 20	RELEVANT STATUTES:	2 U.S.C. §§ 434(b)(2), (4) and (5)
21 22	INTERNAL REPORTS CHECKED:	Audit Documents Disclosure Reports
23	FEDERAL AGENCIES CHECKED:	None
24	I. INTRODUCTION	
25	This matter was generated by a Commission audit pursuant to 2 U.S.C. § 438(b) of the	
26	Dallas County Republican Party ("Committee") covering the period January 1, 2005 through	
27	December 31, 2006. The Audit Division submitted the Final Audit Report ("FAR") to the	
28	Commission on December 18, 2007. Attachment 1.1 On February 8, 2008, the Audit Division	
29	referred Findings 1 and 5 to this Office for enforcement. The audit findings relate to the	
30	Committee's misstatement of financial activity and failure to disclose required information	

The FAR has been approved by the Commission.

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3	III. <u>RECOMMENDATIONS</u>
4	1. Open a MUR.
5 6 7	 Find reason to believe that Dallas County Republican Party and Jonathan Neerman, in his official capacity as treasurer, misstated receipts and disbursements in 2006, in violation of 2 U.S.C. §§ 434(b)(2), and (4).
8 9 10 11	 Find reason to believe that Dallas County Republican Party and Jonathan Neerman, in his official capacity as treasurer, failed to include required information regarding disbursements or disclosed inaccurate information regarding disbursements in 2005 and 2006, in violation of 2 U.S.C. § 434(b)(5).
12	4. Approve the Factual and Legal Analysis.
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15	6. Approve the attached Conciliation Agreement.
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7. Approve the appropriate letter.

Thomasenia P. Duncan General Counsel 5-28-08 BY: Kathleen Guith Acting Deputy Associate General Counsel Susan L. Lebcaux Assistant General Counsel Delbert K. Rigsby Attorney